

following comments.

The associating tag means of claims 1 and 7 is shown in the drawings as consisting of the computer 100 of Fig. 1 executing step 303 of Fig. 3 of step 401 of Fig. 4.

The associating position means of claims 1 and 7 is shown in the specification as the computer 100 executing step 301 of Fig. 3 and step 403 of Fig. 4.

The means for selecting a position in claims 2 and 6 is shown in the drawings as the input device 111 of Fig. 1 and the cursor control input device 206 of Fig. 2.

The means for accessing the frames of video data in claims 2 and 6 is shown in the drawings as the computer 100 or 201, coupled to the video storage 103 or the video disks 202, 203 of Figs. 1 and 2.

The means for associating of claim 5 is shown in Fig. 1 as a computer 100 executing step 303 of Fig. 3 or step 401 of Fig. 4.

Accordingly, it is submitted that each of the features pointed out by the Examiner are shown in Figures. Therefore, reconsideration of the objection to the drawings is respectfully requested.

Objection to the Specification and Rejection of claims 1-2 and 5-9 under 35 U.S.C. §112, first paragraph

The Examiner objected to the specification and rejected claims 1-2 and 5-9 under 35 U.S.C. §112, first paragraph as failing to provide an adequate written description of the invention. This rejection is respectfully traversed and reconsideration is requested in view of the following.

The "means for associating tags with frames of video data. . . ." of claims 1 and 7 corresponds to the position stamping or key stamping described throughout the specification. (See page 3, line 5, line 8, line 19; also see the specification page 18 through page 21.)

The associating tag means is thus the computer executing programs to carry out the stamping operation. Also the associating means is connected to the storage means as known in the art using standard connection technology between computers and storage

devices. The processing means is connected to the associating means using standard software by which data is transferred from one section of a program to another. This is well within the skill in the art and believed adequately disclosed by the specification.

The Examiner asks "what exactly is the associating position means" of claims 1 and 7. This constitutes a computer with a look-up table or other means for assigning an association between a position on the content image and a memory location for a frame of data. (See the specification page 3, line 10 and throughout.)

The "means for selecting a position" of claim 2 is the input device 111 of Fig. 1 or the cursor position input device 206 of Fig. 2.

The "means for accessing" is a computer coupled to a storage device as shown in the specification.

The "means for accessing the frames" embodied by the computer is connected to the "means for selecting a position" embodied by the input device according to standard connection technology well known in the art.

The "means for associating positions" includes data stored in the storage means, which is connected to the computer as well.

The Examiner expressed confusion concerning language in claim 3 and in claim 5. The elements of claim 5 have been substituted for the processing means of claim 3. It is believed that this overcomes the Examiner's objection in this regard.

Accordingly, it is submitted that the specification adequately discloses the invention as required under 35 U.S.C. §112, first paragraph. Therefore reconsideration of the rejection of claims 1-2 and 5-9 is respectfully requested.

Rejection of claims 1, 2, 7, 8 and 9 under 35 U.S.C. §102(b)

The Examiner rejected claims 1, 2, 7, 8 and 9 under 35 U.S.C. §102(b) as anticipated by Naimark, et al. This rejection is respectfully traversed and reconsideration is requested.

In particular, the Naimark reference does not include "processing means, coupled to the means for associating, for assembling a content video image in response to the tags, . . ."

Although the Naimark system inherently includes a content video image, it was not assembled in response to the tags stored with the video data.

Claim 2 which depends from claim 1 is believed to distinguish over Naimark for at least the same reason.

Claim 7 is distinguished over Naimark for at least the reason that it includes the step of "assembling a content video image in response to the tags" as explained above with regard to claim 1. Claims 8 and 9 which depend from claim 7 also distinguish over Naimark for the same reason.

Accordingly, it is submitted that the rejection of claims 1, 2, 7, 8 and 9 under 35 U.S.C. §102(b) is improper, and reconsideration is requested. Furthermore, it is submitted that the Naimark reference does not suggest the present invention.

Rejection of claims 3, 5, 6, 10 and 12-13 under 35 U.S.C. §102(e)

The Examiner rejected claims 3, 5, 6, 10 and 12-13 under 35 U.S.C. §102(e) as anticipated by Morgan. Applicant has amended claims 3 and 10 by combining them with the subject matter of claims 5 and 12, respectively.

As to claim 3, as amended, the Morgan reference does not include the storage means for storing the video data nor the "means for associating" for associating the address of each frame of video data in the storage means with a position in the content video image.

Similarly, as to claim 10, as amended, Morgan does not teach the step of storing the generated frames and associating the addresses of the stored frames with positions in the content image.

The Morgan reference is concerned with controlling surveillance cameras and not generating a data base of addressable stored video images as claimed in the present application.

As mentioned above, claims 5 and 12 have been cancelled.

Claim 6 has been amended to depend from claim 3 as amended. It is distinguished over Morgan for at least the reasons of claim 3 from which it depends.

Claim 13 has been amended to depend from claim 10. It is distinguished over Morgan for at least the same reasons as claim 10.

Accordingly, rejection of claims 3, 6, 10 and 13, as amended, under 35 U.S.C. §102(e) is believed improper, and reconsideration is requested. Furthermore, it is submitted that the Morgan reference does not suggest the present invention.

Rejection of claims 4 and 11 under 35 U.S.C. §103

The Examiner rejected claims 4 and 11 under 35 U.S.C. §103 as unpatentable over Morgan in view of the International Conference on Advanced Robotics paper.

As mentioned above, claims 3 and 10 from which claims 4 and 11 depend have been amended to incorporate the subject matter of claims 5 and 12 respectively. Such claims are believed to distinguish clearly over the Morgan reference. The International Conference paper does not suggest application of robotics in a system as claimed. Furthermore, the combination of the International Conference paper with the Morgan reference does not yield the invention as claimed.

Accordingly, reconsideration of the rejection of claims 4 and 11 under 35 U.S.C. §103 is respectfully requested.

Prior Art of Record

Applicant has reviewed the McGee reference cited by the Examiner. It is not believed to be more pertinent than the references applied.

CONCLUSION

It is submitted that the present application is now in form for allowance, and such action is respectfully requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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